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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NAVAJO HEALTH FOUNDATION – SAGE
MEMORIAL HOSPITAL, INC. (doing
business as “Sage Memorial Hospital”); an
Arizona non-profit corporation,

Plaintiff,

vs.

RAZAGHI DEVELOPMENT COMPANY,
LLC; a Nevada limited liability company
(doing business as “Razaghi Healthcare”),
AHMAD R. RAZAGHI; individually, TAUSIF
HASAN; individually, DOES 1-10;

Defendants.

Case No. 2:19-cv-0329-GMN-EJY

**UNOPPOSED MOTION TO EXTEND
TIME FOR PLAINTIFF TO FILE A
REPLY IN SUPPORT OF PLAINTIFF’S
MOTION TO AMEND COMPLAINT
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 15(a)(2)**

(FIRST REQUEST)

1 Plaintiff respectfully submits this unopposed motion for a one-week extension of time,
 2 September 1, 2020 to September 8, 2020, to file a Reply to Defendants' response to Plaintiff's
 3 Motion for Leave to File a First Amended Complaint Pursuant to Federal Rule of Civil
 4 Procedure 15(a)(2) ("Motion") (ECF No. 76). Defendants themselves previously asked for
 5 (ECF No. 76), and received (ECF No. 81), a one-week extension of time following a similarly
 6 unopposed motion to extend their time to file a Response to the Motion. Pursuant to that
 7 extension, their response is due on August 25, 2020.

9 Plaintiff makes this request due to defense counsel's current case load, which includes
 10 but is not limited to, extensive pleading practice and discovery responses in the instant case as
 11 well as complex and demanding discovery in unrelated matters.
 12

13 This is the first request to extend this deadline. Defendants' counsel has confirmed via
 14 email that they do not oppose a one-week extension of the deadline.

15 RESPECTFULLY SUBMITTED this 21st day of August 2020.

16 FOR SAGE MEMORIAL,

17 /s/ *Paul S. Padda*

18
 19 _____
 20 Kathleen Bliss, Esq.
 21 Paul S. Padda, Esq.
 22 David J. Stander, Esq.
 23 Douglass A. Mitchell, Esq.
 24 Counsel for Plaintiff

25 IT IS SO ORDERED:

26 *Raymond J. Zouchak*
 27 _____
 28 UNITED STATES MAGISTRATE JUDGE

Dated: August 21, 2020